

No.II-45011/94/Tele & Eqpt/2018 775  
Directorate General, ITB Police  
MHA/ Govt. of India  
Lodhi Road, New Delhi-03  
Fax No. 011-24362805

Dated: 08-11-18


To : email ID: [advmn@traigov.in](mailto:advmn@traigov.in) ( Sh. S.T. Abbas, Advisor, TRAI)  
Bcc: [bsnlinmarsat@gmail.com](mailto:bsnlinmarsat@gmail.com)  
From: [digcommn@itbp.gov.in](mailto:digcommn@itbp.gov.in)

Subject: Comments in respect of spectrum charges for TRAI consultation.

Question wise comments are as under:-

Q.N.	Issues for Consultation	Comments of Radio Planning Cell
1.	Do you agree that the formula based spectrum charges should be replaced with AGR (Adjusted Gross Revenue) based SUC (Spectrum Usage Charges) in respect of provision of services by BSNL under its license for 'provision and operation of Satellite based services using Gateway installed in India' under 'suigeneris' category? If yes, what percentage of AGR should be the spectrum usage charges?	Yes; Further, the GPS services caters to the emergency service and <b>there should not be any SUC (Spectrum Usage Chages) for GPS service.</b>
2.	In case your response to Q1 is negative, what should be the spectrum charges and how should it be calculated?	Not Applicable.
3.	In your opinion, while determining the AGR for the purpose of levy of license fee and SUC, whether the cost of handsets (which ios separately indetifiable) should be allowed as deduction from the Gross revenue of BSNL's Satellite based sevice under 'suigeneris' category?	Yes.
4.	If there are any other issue/suggestions relevant to the subject, stakeholders may submit the same with proper explation and justification.	Yes, the following may be considered: a. Geographical areas which have maximum need, are barred for common users, this should be removed.

It is therefore, requested that there is a need to review the decision of levying of ITBP and kindly wave off this charges of ITBP please.

  
Dy-Inspector General (Comn)  
Directorate General, ITB Police